

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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EMMANUEL G. JUSTINIANO, JOSE NIEVES,
JOSE BARBOSA, DAHEED WILLIS,
ANTHONY KEITT, FRANK FODERA, JOSHUA MOSS,
OSCAR PUERTA, LUIS ARENAZA, GUILLERMO MUNOZ,
MILTON LAVERDE, WILLIE S. BREWER,
ISMAEL FRANCISCO, STEVE M. NG, MANUEL SANTOS,
JULIO RIVERA, FREDDY VELEZ, BRYONT A LOPEZ,
MIGUEL CABREJA, JUAN VEVAS, TERRENCE JONES,
NICOLAS SALGADO, LUIS A. VEGA, LOUIS TELESE,
KENNETH WARING, ANTONY G. HILL,
JOSE GOMEZ ROSARIO, RODERICK MASHALL,
JOSE BLANCO, DAVID BAEZ, KENYA EARLY,
SAMMY HERNANDEZ, NELSON MINYETY,
BILL DELVIN, EDWIN J. RAMIREZ CESPEDES,
BENTO RODRIGUEZ, PAUL STARAPOLA,
ANDRES REYES, JESUS A. MARTINEZ,
DAVID BEACH, JONATHAN DELROSARIO,
JAMES SHAW, GARFIELD GAMMON, DESEAN ALLEN,
DERREK HUGHES, JORGE A. MILANES, *and*
CARMELO NYANDUGAR, *each individually and on*
behalf of all other individuals similarly situated,

Plaintiffs,

v.

PHOENIX BEVERAGES, INC., WINDMILL DISTRIBUTING
COMPANY LP, d/b/a PHOENIX/BEEHIVE, RODB, LLC,
LONGFENG TRUCKING, LLC, PHOENIX BEVERAGES
MTO, LLC, FORBEE CAPITAL KEG FUND, LLC,
HEINEKEN NORTH AMERICA, INC., HEINEKEN USA
INCORPORATED, RODNEY BREYMAN, GREGORY
BREYMAN, PAUL ROSSI, JOSEPH STANICH, *and*
GEORGE STRADA,

Defendants.

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13 CV 2332 (TLS)

**NOTICE OF
MOTION**

PLEASE TAKE NOTICE that upon the Affirmation of Peter J. Andrews, dated January 28, 2014, counsel for Plaintiffs herein will move this Court at a date and time to be determined by the Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New

York 10007, for an Order relieving them as counsel for Plaintiffs, Daheed Willis and Anothony Keitt, pursuant to Rule 1.4 of the Federal Rules of Civil Procedure, and for such other and further relief as the Court may deem proper.

Dated: New York, New York
January 29, 2014

By: s/ Peter J. Andrews
Peter J. Andrews [PA-3295]
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